

## GILMORE & MONAHAN

GEORGE R. GILMORE  
THOMAS E. MONAHAN  
JEAN L. CIPRIANI  
Certified Civil Trial Attorney

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW  
ALLEN STREET PROFESSIONAL CENTER  
TEN ALLEN STREET  
P.O. BOX 1540  
TOMS RIVER, NEW JERSEY 08754  
(732) 240-6000 | FAX (732) 244-1840

Please reply to:  
P.O. BOX 1540  
TOMS RIVER, NEW JERSEY 08754

MICHAEL J. GILMORE  
JARED J. MONACO  
LAUREN R. STAIGER  
ROBIN LA BUE  
ANDREA E. WYATT  
DENIS P. KELLY  
PATRICK L. CIMINO  
CHRISTEN E. MCCULLOUGH  
MICHAEL S. NAGURKA  
CHRISTOPHER A. KHATAMI  
MARGARET A. MORIARTY

July 22, 2016

U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Office of the Assistant Attorney General, Main  
Washington, D.C., 20530

**Re: Township of Jackson, Ocean County, State of New Jersey  
Potential Blockbusting Violation**

Dear Sir or Madam:

The undersigned represents the interests of the Township of Jackson as Municipal Attorney. Over the past year, fears of blockbusting have arisen throughout the community of Jackson Township. While the Township takes no position on who buys property within its borders, some individuals have sought to purchase all homes on entire blocks of certain neighborhoods. Furthermore, at several public meetings, many residents have indicated that these individuals have used intimidation and fear in an attempt to accomplish these illegal aims.

The residents of Jackson have been patient as the Council has explored the legal avenues to stop the allegedly illegal activities ongoing. Evidence of the potential violations can be found at the following web addresses:

1. <http://vimeo.com/147244731> (Comments about Jackson around the 7 minute mark)
2. <http://vimeo.com/147257375> (Comments relating to blockbusting around the 5 minute mark)

Please accept this correspondence as a request, for the U.S. Department of Justice, Civil Rights Division, to review the referenced videos and determine whether same demonstrate an intention to engage in blockbusting in the Township of Jackson and other communities referenced therein.

## GILMORE & MONAHAN

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW

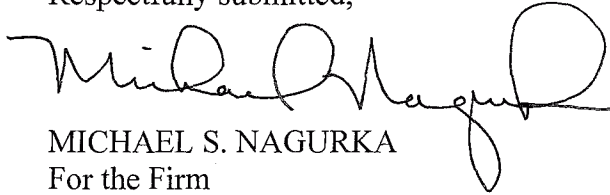
U.S. Department of Justice, Civil Rights Division

Page 2

July 22, 2016

Please contact me with any questions. Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Nagurka". The signature is fluid and cursive, with a large loop at the end.

MICHAEL S. NAGURKA

For the Firm

msn@gm-law.net

MSN:js

cc: Jackson Township Council  
Mayor Reina  
Helene Schlegel, Township Administrator  
Ann Marie Eden, Township Clerk